

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Petition by the Land Mobile)	
Communications Council to Reallocate)	RM-9267
420 MHz to 430 MHz and 440 MHz to)	
450 MHz from the Federal Government)	
to the Private Mobile Radio Service)	
(PMRS))	

OBJECTION TO REALLOCATION PETITION

In its recent petition, the Land Mobile Communications Council has requested that the Commission immediately reallocate the 420 MHz to 430 MHz and 440 MHz to 450 MHz bands from the federal government to the Private Mobile Radio Service on a primary basis. The Amateur Radio Service presently uses 420 MHz to 450 MHz on a secondary basis, with the 430 MHz to 440 MHz segment as an international allocation. I have been a licenced amateur radio operator since 1988, using the 440 MHz to 450 MHz portion of the spectrum since the day my first license arrived in the mail. My purpose in writing is to oppose this reallocation of these portions of the RF spectrum from the federal government to the PMRS.

The Amateur Radio Service is a heavy user of the 420 MHz to 450 MHz band. Portions of this band are utilized to a significant degree for inter-repeater links. Fast scan amateur television takes place on other portions of this band as this is the lowest frequency band available to amateurs with adequate bandwidth to support this mode. The 440 MHz to

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450 MHz portion of the band is heavily utilized in many parts of the country for FM repeater operation, allowing mobile and portable stations to communicate with other amateurs over much greater distances than would be possible without said repeaters. Much emergency communications during times of natural and man-made disasters takes place on the amateur radio infrastructure in place on this band. Hams are able to improvise communications nets in the field due to the great flexibility they are granted in choosing frequencies for operation. This flexibility will be lost to relief agencies in this portion of the spectrum if the PMRS is given primary ownership.

The LMCC request suggests that the Amateur Radio Service can remain secondary to the PMRS in the segments they request. They make no suggestion as to how this might be accomplished. Amateur radio operators have a significant investment in equipment for use in these frequency bands which would be rendered useless if the frequencies were turned over to the PMRS.

In the years since the no-code Technician Class license was created by the Commission there has been a large increase in the numbers of amateur radio operators using the VHF and UHF bands available to the Service. Much of this growth has come in the 420 MHz to 450 MHz portion of the spectrum. Losing 20 MHz of spectrum would be a severe blow to the Amateur Radio Service by forcing operations taking place on the frequencies to other bands. Hams have a long history of coexisting with the military in this band. Could this be said for the commercial exploitation of this spectrum? I seriously doubt that it could.

The LMCC petition suggests that equipment availability and technology resulting from an expanded PMRS would benefit hams. They then concede that the most urgent need for PMRS is voice and low-speed data applications. These are not advanced technologies and offer no advancement of the state of the art. This argument is a smokescreen and hides the fact that this petition is simply a request for more spectrum at the expense of those who have demonstrated its usefulness over the year.

In light of the Amateur Radio Service's long history of emergency communications, much of it conducted on the 420 MHz to 450 MHz portion of the spectrum, this request is not in the national interest. I urge the Commission to reject this portion of the LMCC request.

Thank you for this opportunity to comment on this matter before the Commission.

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